

Exhibit G

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL No. 1456
Master File No. 1:01-CV-12257-PBS
Sub-Category Case No. 1:08-CV-11200

THIS DOCUMENT RELATES TO:
*United States ex rel. Linnette Sun and Greg
Hamilton, Relators*
v.
*Baxter Hemoglobin Therapeutics and Baxter
International Inc.*

Judge Patti B. Saris

DECLARATION OF PETER O'MALLEY

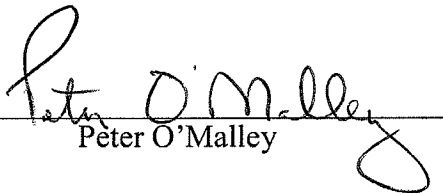
I, Peter O'Malley, declare as follows:

1. I am over the age of 21, under no disability, and am competent to testify to the matters contained in this verification. I make this verification in support of Baxter International Inc's Reply In Support of Its Motion to Dismiss Relators' Complaint.
2. I am the Vice President, Business Alliances, for Baxter Healthcare Corporation's U.S. BioScience BioPharmaceuticals business. Baxter Healthcare Corporation is a subsidiary of Baxter International Inc., One Baxter Parkway, Deerfield, IL 60015-4533, United States of America.
3. I have been employed by Baxter since 1986 and have held my current title since 2006.
4. I have been authorized by Baxter International Inc. to give this verification on its behalf.
5. At various times from approximately 2003 to 2006, I met with Greg Hamilton in his capacity as an employee of Baxter customers Express Scripts and CuraScript.
6. To the extent any of these conversations involved pricing, Mr. Hamilton and I discussed only the prices that Express Scripts and CuraScript would pay for Baxter therapies.
7. I never discussed the pricing of Advate with Mr. Hamilton, other than the prices Express Scripts and CuraScript would pay for Advate.
8. At no time did Baxter change its price for Advate based on recommendations from Mr. Hamilton.
9. I never discussed Average Wholesale Prices (AWP), Wholesale Acquisition Cost (WAC), or Best Prices with Mr. Hamilton.

10. At no time did I discuss pricing strategies with Mr. Hamilton, nor did I ever make any pricing decisions based on his suggestions.

I verify, under penalty of perjury, that that facts set forth herein are true and correct to the best of my knowledge, information, and belief.

Executed on 9/30/09.


Peter O'Malley